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January 30, 2025

**By ECF**

Honorable John P. Cronan  
 United States District Court  
 Southern District of New York  
 500 Pearl Street  
 New York, New York 10007

Re: Joseph Srour v. City of New York et. al.,  
 22-CV-0003 (JPC)

Your Honor:

I am an attorney in the office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, counsel for Defendants City of New York ("City") and New York City Police Department ("NYPD") Commissioner Jessica Tisch. I write, with the consent of Plaintiff's counsel, to respectfully request a 30-day enlargement of time to complete discovery and a corresponding enlargement of time for the parties to file the end-of-discovery update with the Court. This is the first request for such an extension.

By Order dated November 26, 2024, the deadline to complete discovery on damages was set for January 31, 2025, and the parties were directed to file an update and proposed schedule for next steps on February 3, 2025. Since then, Defendants has served interrogatories and document requests, and Plaintiff has responded. However, additional time is needed for the parties to schedule and complete Plaintiff's deposition, and for Plaintiff to search for and produce documents responsive to some of the discovery requests. The parties intend to hold Plaintiff's deposition in February, and are working to identify dates on which all relevant individuals are available.

Accordingly, Defendants respectfully request an enlargement until March 3, 2025 to complete discovery, and an enlargement until March 5, 2025 to file an update with the Court. I thank the Court for its attention to this request.

Respectfully submitted,  
 /s/  
 Aimee K. Lulich

cc: Amy Bellantoni (via ECF)  
*Counsel for Plaintiff*

The request is granted. The deadline for the parties to complete discovery is extended to March 3, 2025, and the deadline for the parties to file a status update with the Court is extended to March 5, 2025. The Clerk of Court is respectfully directed to close Docket Number 57.

SO ORDERED.

Date: January 31, 2025

New York, New York

  
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JOHN P. CRONAN  
United States District Judge